

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**GILBERT JAMES,**

**Plaintiff,**

**v.**

**Civil Action No. 3:11cv00221**

**ENCORE CAPITAL GROUP, INC., *et al.***

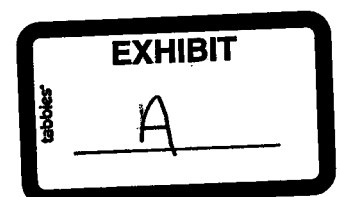
**Defendants.**

**MIDLAND CREDIT MANAGEMENT, INC.'S  
FIRST SET OF INTERROGATORIES TO PLAINTIFF**

Defendant, Midland Credit Management, Inc., by counsel, pursuant to Rule 33 of the Federal Rules of Civil Procedure, propounds the following interrogatories to Plaintiff, Gilbert James. Plaintiff is requested to answer under oath each of the interrogatories set forth below within thirty (30) days of the date of service and thereafter supplement such answers as and when required by all applicable rules.

**Definitions and Instructions**

1. The term “document” or “documents” shall be given the fullest interpretation allowable under the Federal Rules of Civil Procedure. Without limiting the foregoing, “documents” means any form of data compilation, including written, printed, typed, drawn, punched, taped, filmed, recorded, or graphic matter, that you possess, control, or have custody of, or have the right to obtain upon request or demand. This definition includes all copies, reproductions, or facsimiles of documents by whatever means made. If copies of a document are not identical for any reason, including handwritten notations, initials or identification marks, each nonidentical copy is a separate document within the meaning of this definition. With



**INTERROGATORY NO. 7**

Set forth each and every fact or application of law to fact to support your allegation that Defendants violated the Racketeer Influenced and Corrupt Organizations Act, including as alleged in your Complaint. Include in your response the specific subdivision(s) of 18 U.S.C. § 1961, *et seq.* that Defendants are alleged to have violated and all persons with knowledge of your contention.

**ANSWER:**